

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS, NEVADA 89134  
TEL.: (702) 634-5000 – FAX: (702) 380-8572

DARREN T. BRENNER, ESQ.  
Nevada Bar No. 8386  
SCOTT R. LACHMAN, ESQ.  
Nevada Bar No. 12016  
**AKERMAN LLP**  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
Telephone: (702) 634-5000  
Facsimile: (702) 380-8572  
Email: darren.brenner@akerman.com  
Email: scott.lachman@akerman.com

*Attorneys for Bank of America, N.A.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAS VEGAS DEVELOPMENT GROUP, LLC,  
a Nevada limited liability company,

Plaintiff,

vs.

2014-3 IH EQUITY OWNER, LP, a Delaware limited partnership; BANK OF AMERICA, NA, a National Banking Association; MERIDIAN FORECLOSURE SERVICE, a California corporation; THR NEVADA II, LP a Delaware limited partnership; THR PROPERTY BORROWER, LP, a Delaware limited partnership; THR PROPERTY GUARANTOR, LP, a Delaware limited partnership; THR PROPERTY HOLDCO, LP, a Delaware limited partnership; 2014-3 IH PROPERTY HOLDCO, LP, a Delaware limited partnership; 2014-3 IH BORROWER, LP, a Delaware limited partnership; GERMAN AMERICAN CAPITAL CORPORATION, a Maryland corporation; CHRISTIANA TRUST, an unknown business entity; DOE individuals I through XX; and ROE CORPORATIONS I through XX,

Defendants.

Case No.: 2:15-cv-00917-GMN-NJK

**STIPULATION TO EXTEND REPLY  
DEADLINE IN SUPPORT OF BANK OF  
AMERICA, N.A.'S MOTION FOR  
SUMMARY JUDGMENT  
(FIRST REQUEST)**

Bank of America, N.A. (**BANA**) and THR Nevada II, LP (**THR2**), 2014-3 IH Borrower, 2014-13 IH Equity Owner, LP, THR Property Borrower, LP, THR Property Guarantor, LP, THR Property Holdco, LP, and 2014-3 IH Property Holdco, LP (the THR and IH entities collectively, **THR entities**) stipulate to extend BANA's deadline to reply to its summary judgment motion by three weeks. [ECF No. 87].

1 BANA filed its summary judgment motion on September 12, 2019. [*Id.*]. After several  
 2 extensions and a settlement conference, the THR entities filed its response to the motion on May 7,  
 3 2020. [ECF No. 126]. BANA's reply is presently due on May 21, 2020. If allowed a three-week  
 4 extension, the deadline to reply would be June 11, 2020. This is the first request to extend  
 5 this deadline.

6 Good cause exists to extend this deadline due to the complex and novel issues surrounding  
 7 dual NRS 116 and 107 sales. No party will be prejudiced by a three-week extension.

8 Dated May 18, 2020.

9 **AKERMAN LLP**

**GERRARD, COX & LARSEN**

10 /s/ Scott Lachman

/s/ Frederick J. Biedermann

DARREN T. BRENNER, ESQ.

DOUGLAS D. GERRARD, ESQ.

Nevada Bar No. 8386

Nevada Bar No. 4613

SCOTT R. LACHMAN, ESQ.

FREDERICK J. BIEDERMANN, ESQ.

Nevada Bar No. 12016

Nevada Bar No. 11918

1635 Village Center Circle, Suite 200

2450 St. Rose Parkway, Suite 200

Las Vegas, Nevada 89134

Henderson, Nevada 89074

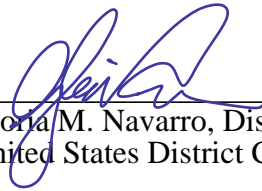
14 *Attorneys for Bank of America, N.A.*

*Attorneys for 2014-13 IH Equity Owner, LP,  
 THR Nevada II, LP, THR Property Borrower,  
 LP, THR Property Guarantor, LP, THR Property  
 Holdco, LP, and 2014-3 IH Property Holdco, LP*

**ORDER**

18 IT IS HEREBY ORDERED that the above stipulation to extend reply deadline in support of  
 19 Bank of America, N.A.'s motion for summary judgment until June 11, 2020 is GRANTED.

20 Dated this 19 day of May, 2020.

21   
 22 \_\_\_\_\_  
 23 Gloria M. Navarro, District Judge  
 24 United States District Court  
 25  
 26  
 27  
 28